

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO: 1:22-CV-717-WO-JLW**

ANGELICA ROSE BROWN,

Plaintiff,

v.

UNIVERSITY OF NORTH
CAROLINA at CHAPEL HILL;
SHIMUL MELWANI (in her
individual capacity); SREEDHARI
DESAI (in her individual capacity);
MICHAEL CHRISTIAN (in his
individual capacity); BOARD OF
GOVERNORS OF THE
UNIVERSITY OF NORTH
CAROLINA;

Defendants.

**UNIVERSITY DEFENDANTS'
MOTION TO DISMISS**

**Fed. R. Civ. P. 12(b)1 and
12(b)(6)**

Defendants the Board of Governors of the University of North Carolina and the University of North Carolina at Chapel Hill, through undersigned counsel, move to dismiss Angelica Rose Brown's complaint under Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure.

In support of this motion, University Defendants rely on the complaint and the brief in support of this motion.

This 18th day of November, 2022.

JOSHUA H. STEIN
Attorney General

/s/ Kenzie M. Rakes
Kenzie M. Rakes
Special Deputy Attorney General
NC State Bar No. 46349
krakes@ncdoj.gov

North Carolina Department of Justice
PO Box 629
Raleigh, NC 27602
Tel: 919-716-6920
Fax: 919-716-6764

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the **UNIVERSITY DEFENDANTS' MOTION TO DISMISS** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all registered CM/ECF users, including Plaintiff's counsel, Valerie L. Bateman (valerie@newsouthlawfirm.com); Artur Davis (adavis@hkm.com); and Lisa Walker (lisa@lisawalkerlaw.com).

This the 18th day of November, 2022.

/s/ Kenzie M. Rakes
Kenzie M. Rakes
Special Deputy Attorney General